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EDWARD BENNETT WILLIAMS (1920-1988)

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April 22, 2020

Via ECF

Hon. Sarah Netburn
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Rich v. Fox News Network, LLC*, No. 18-cv-2223, Joint Motion for Entry of
Amended Stipulated Confidentiality Agreement and Protective Order

Dear Judge Netburn:

Defendant Fox News Network, LLC, together with Plaintiffs and Defendant Zimmerman, respectfully request that the protective order in this case be amended to allow for the designation of certain documents as “highly confidential” as set forth in the enclosed proposed Amended Protective Order. A copy of the proposed protective order was provided to *pro se* Defendant Butowsky on April 16. Mr. Butowsky informed me that due to ongoing medical issues he is currently unable to consent or object.

Respectfully,

/s/ Joseph M. Terry

Joseph M. Terry

Counsel for Fox News Network, LLC

cc: Counsel of record